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Attorneys for Plaintiff MEDIATEK INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

MEDIATEK INC.

Plaintiff,

V.

FREESCALE SEMICONDUCTOR, INC.

Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**NOTICE OF ERRATA RE:
 MEDIATEK'S OPPOSITION TO
 FREESCALE'S MOTION TO
 EXCLUDE TESTIMONY OF
 CATHARINE M. LAWTON (DKT.
 NOS. 323-10, 323-17, 323-19, and 323-
 21)**

Hon. Yvonne Gonzalez Rogers

1 Plaintiff MediaTek, Inc. (“MediaTek”) hereby gives Notice of Errata in its Opposition to
2 Freescale’s Motion to Exclude Testimony of Catharine M. Lawton (“Lawton Opposition”) (Dkt.
3 Nos. 323-10, 323-17, 323-19, and 323-21, filed November 19, 2013). The errata are as follows:
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5 1. MediaTek inadvertently failed to fully redact Exhibit 1 to the Hammon
6 Declaration from the Lawton Opposition (Dkt. No. 323-10), which includes a figure based on
7 information designated by defendant Freescale Semiconductor, Inc. (“Freescale”) as “HIGHLY
8 CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” The attached revised Exhibit 1 to the
9 Hammon Declaration in support of the Lawton Opposition replaces the current Dkt. No. 323-10,
10 as it contains the redactions necessary to protect Freescale’s confidential business information,
11 until such time as this Court rules on MediaTek’s Stipulated Motion for Leave to File Under Seal
12 (Dkt. No. 323).
13

14 2. MediaTek inadvertently failed to properly redact Exhibit 5 to the Hammon
15 Declaration from the Lawton Opposition (Dkt. No. 323-17), which includes technical
16 information concerning the function and operation of the Freescale accused products,
17 information designated by Freescale as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
18 ONLY.” The attached revised Exhibit 5 to the Hammon Declaration in support of the Lawton
19 Opposition replaces the current Dkt. No. 323-17, as it contains the redactions necessary to
20 protect Freescale’s confidential business information, until such time as this Court rules on
21 MediaTek’s Stipulated Motion for Leave to File Under Seal (Dkt. No. 323).
22

23 3. MediaTek inadvertently failed to properly redact Exhibit 6 to the Hammon
24 Declaration from the Lawton Opposition (Dkt. No. 323-19), which includes technical
25 information concerning the function and operation of the Freescale accused products,
26 information designated by Freescale as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES
27
28

ONLY.” The attached revised Exhibit 6 to the Hammon Declaration in support of the Lawton Opposition replaces the current Dkt. No. 323-19, as it contains the redactions necessary to protect Freescale’s confidential business information, until such time as this Court rules on MediaTek’s Stipulated Motion for Leave to File Under Seal (Dkt. No. 323).

4. MediaTek inadvertently failed to properly redact Exhibit 7 to the Hammon Declaration from the Lawton Opposition (Dkt. No. 323-21), which includes technical information concerning the function and operation of the Freescale accused products, information designated by Freescale as “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY.” The attached revised Exhibit 7 to the Hammon Declaration in support of the Lawton Opposition replaces the current Dkt. No. 323-21, as it contains the redactions necessary to protect Freescale’s confidential business information, until such time as this Court rules on MediaTek’s Stipulated Motion for Leave to File Under Seal (Dkt. No. 323).

Dated: November 22, 2013

Respectfully submitted,

MEDIATEK INC.

By its attorneys,

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